

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**PLAINTIFF STATES' UNOPPOSED NOTICE OF REQUEST FOR EXTENSION OF  
TIME TO RESPOND TO NON-PARTY META PLATFORMS, INC.'S MOTION FOR  
PROTECTIVE ORDER**

1. Before the Court is non-party Meta Platforms, Inc.'s ("Meta") Motion for Protective Order, which seeks an order prohibiting the reproduction of certain Meta documents produced to Google by the United States in *United States v. Google LLC*, No. 1:23-cv-000108 (E.D. Va.) (the "EDVA Action"). *See* Dkt. 521.

2. Under the current briefing schedule, Plaintiff States' opposition is due today, June 20, 2024. *See* Dkt. 525.

3. Plaintiff States have been engaging in constructive meet and confers with Meta.

4. Plaintiff States have requested that Meta conduct additional review to confirm which documents are relevant to this action. Meta informed Plaintiff States that it could provide additional information and targeted declarations about the documents at issue in the Motion for Protective Order by Thursday, July 11, 2024.

5. Plaintiff States believe that the additional information and declarations that Meta has committed to providing may resolve, or substantially reduce the scope, of the dispute.

6. To facilitate that review, Plaintiff States request an extension of their deadline to respond until one day after that review is complete.

7. Postponing Plaintiff States' response deadline to Meta's Motion for Protective Order will not prejudice Meta, Google, or any other party. The review and additional meet and confer efforts will also reduce the effort the Court must expend in resolving any dispute.

8. Therefore, Plaintiff States request that the Court extend their deadline to respond to the Motion for Protective Order by three weeks, until July 12, 2024.

9. Meta does not oppose this request for an extension.

Dated: June 20, 2024

Respectfully submitted,

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*Submitted on behalf of all Plaintiff States*

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**CERTIFICATION OF CONFERENCE**

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Meta Platforms, Inc. does not oppose the foregoing extension request.

/s/ Noah S. Heinz  
Noah S. Heinz

**CERTIFICATE OF SERVICE**

I certify that on June 20, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Noah S. Heinz  
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